# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS **EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS DT Bv:

INDICIGASE No: EP:24-CR-01370-KC UNITED STATES OF AMERICA, § **§** § § Plaintiff, CT 1: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i) - Conspiracy to Harbor Aliens: v. CT 2: 8 U.S.C. §§ 1324(a)(1)(A)(iii) and YOHANGEL JAVIER (a)(1)(B)(ii) - Harboring Aliens. **MARTINEZ-GONZALEZ,** Defendant.

THE GRAND JURY CHARGES:

# **COUNT ONE**

On or about June 6, 2024, in the Western District of Texas, Defendant,

# YOHANGEL JAVIER MARTINEZ-GONZALEZ,

knowingly, intentionally, and unlawfully conspired, combined, and confederated, and agreed with others to the Grand Jury known and unknown, to commit an offense against the United States, namely: knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i).

# **COUNT TWO**

On or about June 6, 2024, in the Western District of Texas, Defendant,

# YOHANGEL JAVIER MARTINEZ-GONZALEZ,

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(ii).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA UNITED STATES ATTORNEY

Assistant U.S. Attorney